

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DWAYNE R. TORRENCE, JR.,

Plaintiff,

v.

BARTELS, M.D., *et al.*

Defendants

Civil Action No. SAG-20-1223

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Dwayne R. Torrence, Jr. and Defendants, by their undersigned counsel, jointly move for an Order modifying the Court's August 6, 2021 Scheduling Order.

As grounds for this Motion, the parties state as follows:

1. The parties have met and conferred about the deadlines set out in the August 6, 2021 Scheduling Order.
2. At the same time, the parties discussed the scheduling of depositions and the preparation of expert witness reports.
3. Plaintiff and Defendants are still in the process of scheduling and taking the depositions of parties to this case.
4. Based on the parties' discussion and on the above facts, the parties agree that an extension of the current deadlines will allow the case to be best developed for presentation to the Court. No party will be prejudiced by these modifications and there is no trial date currently scheduled.

5. The parties jointly request that the Scheduling Order be modified as follows:

| | |
|-----------------|--|
| March 18, 2022: | Plaintiff's Rule 26(a)(2) disclosures |
| April 12, 2022: | Defendants' Rule 26(a)(2) disclosures |
| May 12, 2022: | Plaintiff's rebuttal Rule 26(a)(2) disclosures |
| June 11, 2022: | Rule 26(e)(2) supplementation of disclosures and responses |
| June 30, 2022: | Discovery deadline; submission of status report |
| July 15, 2022: | Requests for admission |
| July 31, 2022: | Dispositive pretrial motions deadline |

A proposed Order to this effect is attached.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

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/s/

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